

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Case No. 14-CV-1467 (DWF/DTS)

WALTER LOUIS FRANKLIN, II,
Trustee for the Estate of Terrance
Terrell Franklin,

Plaintiff,

v.

LUCAS PETERSON,
individually and in his official
capacity; MICHAEL MEATH,
individually, and in his official
capacity; JANE HARTAU,
Chief of Police for the
Minneapolis Police Department,
individually and in her official
capacity; and the CITY OF
MINNEAPOLIS,

Defendants.

DECLARATION OF MICHAEL B. PADDEN

Michael B. Padden hereby declares:

1. I have been lead counsel throughout this case. My work began in May of 2013 which time frame over is now over 6 ¾ years.
2. My firm's time on this case is estimated to be 800 hours. Lawyers for my co-counsel Chicago law firm expended an estimated 200 hours.
3. This matter was handled on a 40% contingency fee basis. Plaintiff, my co-counsel, and I executed the fee agreement.
4. Counsel have agreed to a fee discount of \$3,000 based on an \$800,000 settlement, not the actual settlement, \$795,000. (See Paragraphs 10 and 11 for the Proposed Order).

5. The documents attached to this Declaration are true and correct copies of the originals.
6. The costs reflected for each firm are accurate. (See Exhibits E and F).
7. Ringler is recognized as a well-respected structured settlement annuity company and has provided annuity choices to the minor's mother based on predicted potential distribution for the minor which obviously may be different based on the Court's decision. She has chosen option two. See Ann Marie Von Bank's email with attachments dated February 19, 2020 and attached hereto as Exhibit G.
8. Exhibit A is the trustee document that lists the heirs. Exhibits C, D, E, and H are the waiver documents for Heirs Classie Franklin, Carissa Franklin, Walter Franklin, III, and Walter Lee Franklin.
9. Exhibits I and J are copies of the deposition transcripts of Heirs [REDACTED] and [REDACTED] who were deposed on February 21, 2020 in Rockford, IL.
10. The contents of the Memorandum of Law in support of this motion are true and correct to the best of my knowledge along with all of the other submissions for this motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/Michael B. Padden
Michael B. Padden

Date: February 24, 2020